

California Regional Water Quality Control Board  
Santa Ana Region

January 17, 2003

ITEM: 18

SUBJECT: Executive Officer's Report

DISCUSSION:

**1. Proposed Enforcement Order Requiring Adequate Protection for the Santa Ana Regional Interceptor (SARI)** – The SARI is a regional sewer interceptor designed to collect and transport brines and other wastewaters from the Upper Santa Ana River Basin down to the lower basin for treatment by the Orange County Sanitation District (OCSD). Ownership and management responsibility for the SARI is complicated, but suffice it to say that the two main players in the management of the line are OCSD and the Santa Ana Watershed Project Authority (SAWPA). Also, the member agencies of SAWPA have some responsibility for management of actual discharges to the line.

During recent years, the value of the SARI to the economy and development of the Inland Empire and the importance of the line to water quality in both the upper and lower basins have become well recognized. Not only does the line provide a place where industries may discharge saline waste and other industrial wastewaters, it also supports the development of desalters in the Upper Basin (including the San Jacinto Basin) for both the clean up of historic discharges to the groundwater basins and as an important component of public water supply management activities (safe yield of groundwater basins).

We have previously presented information to the Board concerning the threat to water quality posed by the loss of cover over the SARI within the alignment of the Santa Ana River bed from Prado Dam to near Yorba Linda. For a number of years, OCSD and SAWPA have been trying to reach agreement on a strategy to protect the line. In spite of the passage of years trying to find a solution, I believe that the two agencies have not made adequate (or much) progress to address and eliminate the threat to the line posed by flood flows in the River and to downstream water quality, should the SARI fail.

Below Prado Dam, the SARI is located within the alignment of the Santa Ana River. When much of the alignment of the SARI was designed and constructed in the 1970's, it was felt that the design provided adequate cover to protect the sewer line from damage by high flows in the River. However, recent inspections of the line have found that much of that cover has been eroded away. We have reviewed the inspection reports and find that there are some reaches of the SARI that have seriously inadequate cover,

and we believe that this is a threat to the line and to downstream water quality that must be addressed by the agencies responsible for SARI.

OCSD and SAWPA have indicated that they believe they may have the makings of an agreement to address this situation. However, given the history of this process, it would be somewhat optimistic to believe that OCSD and SAWPA will be able to jointly implement a solution to this problem without regulatory encouragement to stay on an aggressive schedule. As OCSD has investigated the state of the SARI and alternatives for protection, costs for some of the project alternatives have been found to be extraordinarily expensive. Nonetheless, the environmental and economic consequences of failure of the SARI would be staggering. It is appropriate that this matter be addressed, and we have notified the parties that we intend to present a cease and desist order for consideration by the Regional Board at the May 16, 2003 meeting in Santa Ana. The order would require the responsible agencies to provide adequate protection for the SARI in order to significantly reduce the threat of failure of the line. We would also propose a time schedule for compliance.

**2. Waste Discharge Requirements Addressing Sanitary Sewer Overflows** – On April 26, 2002 the Board adopted Order No. RB8-2002-0014, Waste Discharge Requirements for Sewage Collection Agencies in Orange County Within the Santa Ana Region (WDRs). These WDRs require the 33 sewage collection agencies in Orange County to provide appropriate maintenance and operations of the sewage collection systems in order to prevent sewage spills that result in discharges of raw sewage to surface waters and beach closures. The WDRs include a time schedule requiring completion of a Sewage System Management Plan (SSMP) by September 2005. This schedule also includes interim tasks and schedules for a SSMP development plan by September 30, 2002, an emergency response plan by January 1, 2003, a preventative maintenance program by June 15, 2003, legal authority by July 2004, a grease control plan by December 2004, and a capacity evaluation by July 2005. All the agencies, except for the City of Stanton, are in compliance with the time schedule in the WDRs. At staff's request, the City of Stanton has submitted a corrective action plan to get them back into compliance with the WDRs by the end of January 2003, by submitting the required SSMP development plan and spill response plan. The agencies have also been working together to develop a grease control program and to help each other meet the requirements of the WDRs. The Orange County Sanitation District, Costa Mesa Sanitary District, and the cities of Seal Beach, Anaheim, Huntington Beach, and Santa Ana have been leading these efforts.